

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

-v-

25-MC-6001

\$77,429.00 and \$360.00  
UNITED STATES CURRENCY,

Defendants.

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**STIPULATION TO EXTEND PLAINTIFF'S TIME  
TO FILE COMPLAINT IN CIVIL FORFEITURE ACTION**

**IT IS HEREBY STIPULATED** and agreed upon between and among the United States of America by its attorney, Trini E. Ross, United States Attorney for the Western District of New York, Mary Clare Kane, Assistant United States Attorney, of counsel, and James S. Wolford, Esq., counsel for Guangping Sun and Todd Warner, that pursuant to Title 18, United States Code, Section 983(a)(3)(A), the government's time to file a Verified Complaint for Forfeiture is extended **from January 16, 2025 to April 16, 2025**.

The parties to this Stipulation further agree that Guangping Sun and Todd Warner may revoke their consent to this agreement to an extension; and that in that event, the government shall then have twenty (20) days from the date the government received notice of such action to file its Verified Complaint for Forfeiture.

A party's electronic signature and/or e-mailed signature of this Stipulation will be valid and sufficient to bind any such party to this Stipulation and will have the same force and effect as an original signature.

DATED: Rochester, New York, January 6, 2025.

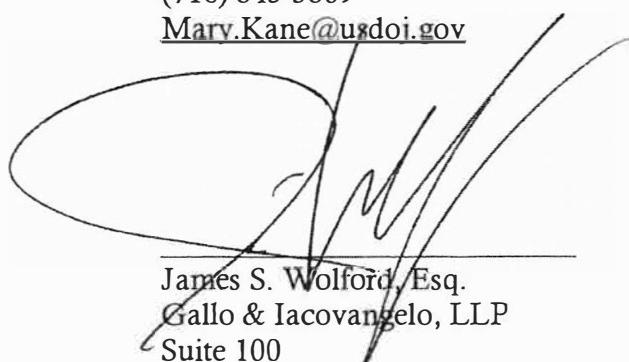
TRINI E. ROSS  
United States Attorney

Dated: 1/3/25

MARY KANE Digitally signed by MARY KANE  
Date: 2025.01.03 12:01:57 -05'00'

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Dated: 1/3/25

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